

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____	X	
PLUMBERS' UNION LOCAL NO. 12	:	Civil Action No. 1:08-cv-01958-JGK
PENSION FUND, Individually and On Behalf	:	
of All Others Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
SWISS REINSURANCE COMPANY, et al.,	:	
	:	
Defendants.	:	
_____	X	

**NOTICE OF MOTION FOR APPOINTMENT AS LEAD PLAINTIFF
AND FOR APPROVAL OF SELECTION OF LEAD COUNSEL**

PLEASE TAKE NOTICE that Institutional Investor Plumbers' Union Local No. 12 Pension Fund ("Plumbers' Pension Fund") will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) appointing Plumbers' Pension Fund as Lead Plaintiff; (ii) approving Plumbers' Pension Fund's selection of the law firm of Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel; and (iii) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Plumbers' Pension Fund submits herewith a Memorandum of Law and Declaration of Mario Alba, Jr. dated April 28, 2008.

DATED: April 28, 2008

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SAMUEL H. RUDMAN
DAVID A. ROSENFELD
MARIO ALBA, JR.

/s/ Mario Alba, Jr.
MARIO ALBA, JR.

58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

[Proposed] Lead Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, Mario Alba Jr., hereby certify that on April 28, 2008, I caused a true and correct copy of the attached:

Notice Of Motion For Appointment As Lead Plaintiff and For Approval Of Selection Of Lead Counsel;

Memorandum In Support Of The Motion Of Plumbers' Union Local No. 12 Pension Fund For Appointment As Lead Plaintiff and For Approval Of Selection Of Lead Counsel; and

Declaration of Mario Alba, Jr. In Support Of The Motion Of Plumbers' Union Local No. 12 Pension Fund For Appointment As Lead Plaintiff and For Approval Of Selection Of Lead Counsel

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to all additional counsel on the attached service list.

/s/ Mario Alba, Jr.
Mario Alba, Jr.

SWISS RE

Service List - 4/24/2008 (08-0040)

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Counsel For Defendant(s)

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Plaintiff,	:	
	:	
vs.	:	
	:	
SWISS REINSURANCE COMPANY, et al.,	:	
	:	
Defendants.	:	
_____	X	

**[PROPOSED] ORDER APPOINTING LEAD PLAINTIFF
AND APPROVING SELECTION OF LEAD COUNSEL**

Having considered the motion of Plumbers' Union Local No. 12 Pension Fund ("Plumbers' Pension Fund") for Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel and the Memorandum of Law and Declaration of Mario Alba, Jr., in support thereof, and good cause appearing therefore:

1. Plumbers' Pension Fund is hereby appointed Lead Plaintiff for the Class pursuant to Section 21D of the Securities Exchange Act of 1934; and

2. The law firm of Coughlin Stoia Geller Rudman & Robbins LLP is hereby appointed Lead Counsel.

* * *

ORDER

IT IS SO ORDERED.

DATED: _____

THE HONORABLE JOHN G. KOELTL
UNITED STATES DISTRICT JUDGE